

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

IN THE MATTER OF:

JOINT APPLICATION OF LOUISVILLE )  
GAS AND ELECTRIC COMPANY AND )  
KENTUCKY UTILITIES COMPANY FOR )  
A CERTIFICATE OF PUBLIC CONVENIENCE ) DOCKET NO.  
AND NECESSITY FOR CONSTRUCTION ) 2005-00142  
OF TRANSMISSION FACILITIES IN )  
JEFFERSON, BULLITT, MEADE AND )  
HARDIN COUNTIES, KENTUCKY )

JUN 30 2005

PUBLIC SERVICE  
COMMISSION

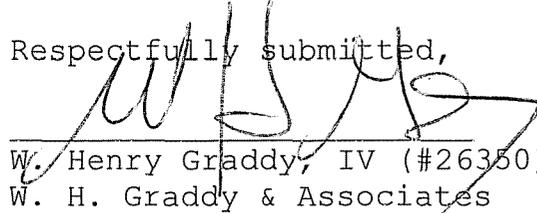
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NOTICE OF ENTRY OF APPEARANCE

\* \* \* \* \*

Come now the Intervenors, Cathy L. Cunningham and  
Dennis L. Cummingham, and hereby give NOTICE OF ENTRY OF  
APPEARANCE of their counsel, W. Henry Graddy, IV, W. H.  
GRADDY & ASSOCIATES, 103 Railroad Street, P.O. Box 4307,  
Midway, KY 40347, who will provide legal representation  
for these Intervenors in all future matters of this action  
before the Kentucky Public Service Commission.

Respectfully submitted,

  
W. Henry Graddy, IV (#26350)  
W. H. Graddy & Associates  
103 Railroad Street  
P.O. Box 4307  
Midway KY 40347  
[hgraddy@aol.com](mailto:hgraddy@aol.com)  
859-846-4905  
859-846-4914 fax

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was duly served by mailing, first class postage prepaid to the following:

Hon. A.W. Turner  
Public Service Commission  
211 Sower Blvd.  
P.O. Box 615  
Frankfort, KY 40602

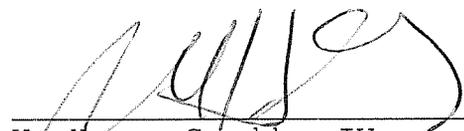
Kendrick R. Riggs  
J. Gregory Cornett  
Odgen, Newell, and Welch  
1700 PNC Plaza  
500 West Jefferson  
Louisville, Kentucky 40202

Robert M. Watt, III  
Lindsey W. Ingram, III  
Stoll, Keenon, and Park, LLP  
300 West Vine Street, 2100  
Lexington, Kentucky 40507

Elizabeth L. Cocanougher  
Senior Regulatory Counsel  
Louisville Gas and Electric Company  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232

Attorney General Greg Stumbo  
Office of the Attorney General  
State Capitol, Suite 118  
Frankfort, Kentucky 40601

This the 30 day of June, 2005.

  
W. Henry Graddy, IV

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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IN THE MATTER OF:

PUBLIC SERVICE  
COMMISSION

JOINT APPLICATION OF LOUISVILLE GAS	)	
AND ELECTRIC COMPANY AND KENTUCKY	)	
UTILITIES COMPANY FOR A CERTIFICATE OF	)	CASE NO.
PUBLIC CONVENIENCE AND NECESSITY FOR	)	2005-00142
CONSTRUCTION OF TRANSMISSION FACILITIES	)	
IN JEFFERSON, BULLITT, MEADE, AND HARDIN	)	
COUNTIES, KENTUCKY	)	

\* \* \* \* \*

INTERVENORS DENNIS AND CATHY CUNNINGHAM'S  
FIRST DATA REQUEST TO LOUISVILLE GAS  
AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Pursuant to the scheduling order adopted by the Commission in this case, Intervenor Dennis Cunningham and Cathy Cunningham ("Cunningham") request that Louisville Gas and Electric Company ("LG&E") and Kentucky Utilities Company ("KU") file with the Kentucky Public Service Commission ("Commission") the following information, with a copy to all parties of record.

1. Please provide a copy of any studies that have been undertaken or commissioned by LG&E or KU concerning alternative routes or alternative configurations for the proposed transmission facilities, and concerning the need for the proposed 750 MW supercritical pulverized coal fired base load generating unit to be constructed at the Trimble County Generating Station ("TC2"), described in the

statement of basis in the above referenced joint application.

2. Please provide a copy of any studies, including any environmental impact statement or environmental assessment, produced by or on behalf of any federal or state agency or by LG&E or KU, evaluating the environmental impacts of the proposed transmission facilities and alternatives and of the proposed TC2. Please provide all studies and reports, other than the testimony of J. Nate Mullins, already filed, that provide a basis for the claim made in the statement of convenience in the above referenced joint application that the proposed transmission facilities will have "as little negative impact as can be reasonably afforded."

3. Please provide a copy of any studies that have been undertaken or commissioned by LG&E or KU concerning alternative approaches to vegetation management for the proposed transmission facilities' right-of-way.

4. Please identify by product name any herbicides or pesticides that will be used, if any, and the manner of application for the transmission line right-of-way.

5. Has LG&E or KU made application to any federal or state agency for any permits, licenses, authorizations or

other approvals necessary for these proposed transmission facilities or for the TC2?

6. If the answer to Question 5 is "yes, "please identify each application by date and agency to which application was made, and provide a copy of the application and the response, if any from such agency.

7. Does LG&E or KU intend to acquire the necessary rights-of-ways on a voluntary basis or through condemnation?

8. Please provide a copy of any application that has been made to the Department of Energy or any other federal agencies, for any loan, loan guarantee or other financial assistance for the proposed transmission facilities or for TC2, if there are any such applications.

9. Please provide a copy of any studies conducted of historical and cultural resources that will be impacted by the proposed transmission facilities or by the proposed TC2.

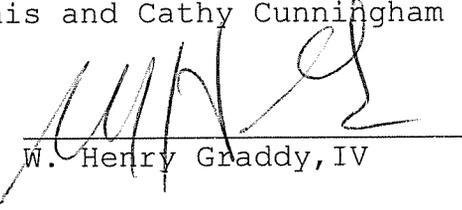
10. Per the statement of J. Nate Mullins, page 6, filed with the joint application, the selected route crosses the property of Fort Knox Military Reservation. Please provide all correspondence related to crossing this property, all applications for permission to cross, and all replies from the representatives of Fort Knox concerning

crossing this federal property. Please provide all studies and reports prepared by LG&E or KU or by or for Fort Knox Military Reservation and provided to LG&E or KU concerning crossing this property.

Respectfully submitted,

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Counsel for Intervenors  
Dennis and Cathy Cunningham

By:

  
W. Henry Graddy, IV

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed by facsimile and the original and ten (10) copies have been duly served by first-class mail upon the following individuals, and on counsel for LG&E and KU electronically, this the 30 day of June, 2005.

Hon. A.W. Turner  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, Kentucky 40602  
[Aw.turner@ky.gov](mailto:Aw.turner@ky.gov)

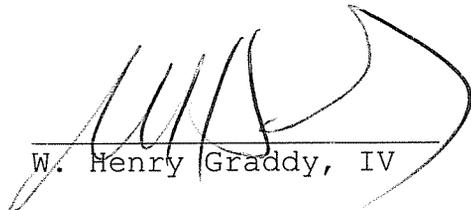
Hon. Kendrick R. Riggs  
Hon. J. Gregory Cornett  
Ogden Newell & Welch PLLC  
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Telephone: (502) 582-1601

Hon. Robert M. Watt, III  
Hon. Lindsey W. Ingram, III  
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Counsel for Louisville Gas and Electric  
Company and Kentucky Utilities Company

Hon. Greg Stumbo  
Attorney General  
State Capital  
Frankfort, Kentucky 40601



W. Henry Graddy, IV